

**UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF GEORGIA  
ATLANTA DIVISION**

IOU CENTRAL, INC. d/b/a  
IOU FINANCIAL, INC.,

Plaintiff,

v.

CASE NO. 1:20-CV-02863-CC

BENZ ACQUISITION CO, INC.  
d/b/a  
BENZ SPRING CO.,  
J&J AMUSEMENTS, INC., and  
DANIEL D. HANSEN,

Defendants.

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**CERTIFICATION OF GOOD FAITH EFFORT TO RESOLVE  
DISCOVERY DISPUTE**

COMES NOW the undersigned counsel for the J&J Defendants, pursuant to Fed. R. Civ. P. 37, and certifies that the J&J Defendants and the undersigned have in good faith conferred or attempted to confer with Plaintiff and its counsel in an effort to obtain the discovery responses and documents discussed in the Motion to Compel without court action. The good faith efforts are evidenced by a December 4, 2020 letter and a subsequent, January 15, 2021 email, which are attached to the Motion to Compel as **Exhibits A and D**, respectively. Plaintiff did not respond in

any way (via letter, email, telephone, or in-person) to either of these attempts to engage Plaintiff in a conference regarding the discovery disputes.

This 19th day of January, 2021.

BAKER DONELSON BEARMAN CALDWELL  
& BERKOWITZ, P.C.

By: /s/ Ashley S. Thompson  
Linda A. Klein  
State Bar No. 425069  
Ashley S. Thompson  
State Bar No. 100109  
***Attorneys for the J&J Defendants***

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